

Exhibit E

From: [Stamatelos, Pauline \(USANYE\)](#)
To: [Stamatelos, Pauline \(USANYE\)](#); [Caleb Kruckenberg](#); [Steve Simpson](#); jhoughton@pacificlegal.org
Cc: [Jessica Thompson](#)
Subject: RE: [EXTERNAL] RE: USA v. Rare Breed Triggers, LLC, 23-cv-369
Date: Tuesday, April 25, 2023 5:42:00 PM
Attachments: [image001.png](#)

Counsel,

As a courtesy, we write to inform you that today we received documents from UPS in response to the subpoena we served on February 16, 2023. These documents appear to include shipping records, including names and addresses, for RBT customers.

Please let us know if you want to discuss further.

Kindest Regards,
Paulina

From: Stamatelos, Pauline (USANYE) <PStamatelos@usa.doj.gov>
Sent: Thursday, February 16, 2023 1:23 PM
To: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>; Steve Simpson <SSimpson@pacificlegal.org>; jhoughton@pacificlegal.org
Subject: FW: [EXTERNAL] RE: USA v. Rare Breed Triggers, LLC, 23-cv-369

Caleb, sending to the rest of your team. Thank you, Paulina

From: Stamatelos, Pauline (USANYE)
Sent: Thursday, February 16, 2023 1:22 PM
To: Caleb Kruckenberg <CKruckenberg@pacificlegal.org>
Cc: Marutollo, Joseph (USANYE) <JMarutollo@usa.doj.gov>; Blume, Michael (USANYE) <MBlume@usa.doj.gov>; Merenda, Jill (USANYE) <JMerenda@usa.doj.gov>
Subject: RE: [EXTERNAL] RE: USA v. Rare Breed Triggers, LLC, 23-cv-369

Counsel, please see attached.

During the parties' February 13 meet and confer, Defendants stated that they would agree to produce documents and communication to discovery demands on an expedited and rolling basis (consistent with the Court's order), so long as the United States narrowed its document demands to RBT's and RFT's connections to New York State. The United States sent the below email on February 14 narrowing the United States' document demands; Defendants' response to this email remains outstanding.

Defendants had offered to produce information relating to RBT's retail customers with mailing addresses located in New York State to whom RBT sold or transferred FRT-15s and WOTs. Although Defendants initially refused to produce its business records showing all wire transfers made into bank account number 693581008 at JPMorgan Chase on behalf of RBT, among other business records regarding this account with JPMorgan Chase, the Court has